



PUGET SOUND
KING COUNTY

AIR POLLUTION CONTROL AGENCY
KITSAP COUNTY

RECEIVED
APR 21 1996
AGCW-SEATTLE
PIERCE COUNTY
SNOHOMISH COUNTY

April 18, 1996

Gerry Brown
Ash Grove Cement Co.
3801 E. Marginal Way S.
Seattle, WA 98134

Dear Mr. Brown:

**Disposition of Notice of Violation No. 34415
PSAPCA Reg. No. 11339**

Based on the information you provided to us in your corrective action letter dated March 21, 1996, this Agency considers the above-referenced matter closed and will take no further enforcement action in this case. We concur that the opacity monitor recorded steam forming inside the stack on December 5, 1995.

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,

Neal J. Shulman
Manager - Inspection

cc: Rosemary G. Busterna, PSAPCA

EMG\cbc

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Chairman: Win Granlund, Commissioner, Kitsap County
Janet Chalupnik, Member at Large
Edward D. Hansen, Mayor, Everett

Lynn S. Horton, Mayor, Bremerton
R.C. Johnson, Councilman, Snohomish County
Gary Locke, King County Executive

Harold G. Moss, Mayor, Tacoma
Norman B. Rice, Mayor, Seattle
Doug Sutherland, Pierce County Executive

110 Union Street, Suite 500, Seattle, Washington 98101-2038 (206) 343-8800 (800) 552-3565 FAX: (206) 343-7522

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AGCS2M001057



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY ▲ KITSAP COUNTY ▲ PIERCE COUNTY ▲ SNOHOMISH COUNTY

April 18, 1996

Gerry Brown
Ash Grove Cement Co.
3801 E. Marginal Way S.
Seattle, WA 98134

RECEIVED
APR 25 1996
AGCW-SEATTLE

Dear Mr. Brown:

**Disposition of Notice of Violation No. 34413
PSAPCA Reg. No. 11339**

Based on the information you provided to us in your corrective action letter dated March 21, 1996, this Agency considers the above-referenced matter closed and will take no further enforcement action in this case. We concur that the NOx excess emissions on December 21 and 22, 1995 were the result of an upset condition and are therefore exempt under the WAC 173-400-107(6).

If you have any questions concerning this matter, please contact me at 689-4078.

Sincerely,

Neal J. Shulman
Manager - Inspection

cc: Rosemary G. Busterna, PSAPCA

EMG\cbc

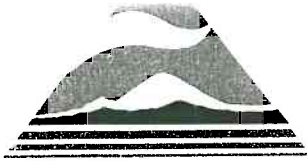
Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

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Doug Sutherland, Pierce County Executive



PUGET SOUND AIR POLLUTION CONTROL AGENCY
KING COUNTY ▲ KITSAP COUNTY ▲ PIERCE COUNTY ▲ SNOHOMISH COUNTY

March 12, 1996

Reg. No. 11339

Gerry Brown
Ash Grove Cement Co.
3801 E Marginal Way S
Seattle, WA 98134

RECEIVED

MAR 13 1996

AGCW-SEAFILE

Dear Mr. Brown:

The Agency has reviewed your December 1995 CEM Report and request for WAC 173-400-107 Unavoidable Excess Emissions exemption. The event was attributed to fuel switching from coal to natural gas and the overheating of the kiln. The Ash Grove Cement Plant Operation and Maintenance Plan does not show procedures to minimize emissions during fuel switching.

Please submit these procedures to the Agency within 10 days of receipt of this letter. These procedures should include corrective actions that will be taken to prevent excess emissions in the future. The copy of your procedures in our file is stamped DRAFT. Please submit your most current Operation and Maintenance Plan.

You referenced WAC 173-400-107 Section 4 for startup. However, Section 3 only exempts excess emissions as avoidable when there is a known cause. There is no discussion in your report identifying the cause, corrective actions and preventive measures. WAC 173-400-107 contains the criteria to adequately demonstrate a violation is unavoidable.

Please feel free to contact me if you have any questions.

Sincerely,

Fred Austin
Air Pollution Engineer

cc: Elizabeth Gilpin, PSAPCA
Melissa McAfee, PSAPCA
Rosemary Busterna, PSAPCA
MM/cbc

Dennis J. McLerran, Air Pollution Control Officer

B O A R D O F D I R E C T O R S

Chairman: Win Granlund, Commissioner, Kitsap County
Janet Chalupnik, Member at Large
Edward D. Hansen, Mayor, Everett

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Harold G. Moss, Mayor, Tacoma
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As with the latter, the December 5, 1995 event occurred prior to the introduction of feed to the system and with the main baghouse operating normally. The main baghouse had no problems prior to or following the event that would indicate a cause for an emission. The addendum to the CEM report stated that no cause for the opacity could be found and it cleared up on its own. The duration of the event seems consistent with the amount of refractory replaced. Therefore, we now believe that no emission occurred and the opacity readings were caused by steam condensing in the stack before the opacity monitor.

Please let me know if you have any further question.

Yours truly,



Gerald J. Brown
Manager Safety and Environment

Copy: Henrik Voldbaek
Nate Fernow
Trygve Hille

ASH GROVE CEMENT COMPANY



"WESTERN REGION"

March 20, 1996

Mr. Fred Austin,
Puget Sound Air Pollution Control Agency
110 Union Street, Suite 500
Seattle, WA. 98101-2038

Re: Notices of Violation 34413 and 34415

Dear Mr. Austin:

Thank you for your March 13 letter requesting further information regarding the NOx emission of 12/21/95 and 12/25/95 referenced in NOV #34413 and the opacity measurement of 12/05/95 referenced in NOV #34415.

NOV #34413

NOx emissions above the 1 hour limit of 700 ppmc were reported as the result of an upset condition and exempt under WAC 173-400-107 (6) Excess emissions due to upsets. These events were caused by the emergency switching of fuels firing the kiln when hot spots or potential fires were detected in the pulverized fuel (coal) storage bin. The firing of the kiln was switched from coal to natural gas while the coal bin was emptied to eliminate the hot spot. This rapid switching of fuels to avert a potential emergency caused an unstable condition to occur in the kiln. The combination of firing the kiln with natural gas (which in general generates higher NOx than coal) and the upset condition in the kiln induced by the rapid fuel change generated the excessive NOx.

This event was not caused by nor the result of inadequate design, operation or maintenance and is not addressed in our current Operation and Maintenance Plan accompanying this response. Appropriate corrective actions were taken to stabilize the kiln and to reduce kiln temperature. As pointed out in the addendum to the December 1995 CEM Report, occasional hot spots or smoldering coal in the pulverized fuel bin is unavoidable despite our on going prevention efforts.

NOV #34415

The December 1995, an opacity measurement in excess of the 5% hourly average for 2 hours was reported and the addendum to the CEM report claimed a Start up exemption under WAC 173-400-107 (4). We now believe that the opacity monitor recorded steam forming inside the stack and that no emission had occurred. A section of refractory known to contain water was replaced in the kiln and during start up under cold weather conditions steam formed in the stack riser. The cause of the opacity reading was not immediately recognized as it had not occurred previously. A similar steam event occurred later on January 19, 1996. This event occurred after a much larger amount of refractory was replaced and because of its duration (10 hours), we were able to confirm the measured opacity was steam condensing in the stack before the opacity monitor.

AGCS2M001061

PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington 98101-2038

206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339
 Cert. Mail No. 2035473352

No. 34415

NOTICE OF VIOLATION

Date of Violation: December, 1995 at _____m.

Name <div style="font-size: 1.2em; margin-top: 10px;">Ash Grove Cement Co.</div>	Responsible Person, Title <div style="font-size: 1.2em; margin-top: 10px;">Gerry Brown Manager Environment</div>		
Location of Violation (Address) <div style="font-size: 1.2em; margin-top: 10px;">3801 East Marginal Way So.</div>	City <div style="font-size: 1.2em; margin-top: 10px;">Seattle</div>	Zip <div style="font-size: 1.2em; margin-top: 10px;">98134</div>	County <div style="font-size: 1.2em; margin-top: 10px;">King</div>
Mailing Address <div style="font-size: 1.2em; margin-top: 10px;">as above</div>	City, State <div style="font-size: 1.2em; margin-top: 10px;">Seattle, WA</div>	Zip <div style="font-size: 1.2em; margin-top: 10px;">"</div>	Phone <div style="font-size: 1.2em; margin-top: 10px;">(206) 623-5596</div>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION I OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 6.09(b) Failure to meet conditions of an Order of Approval.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.04 Particulate matter deposited in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Operation of vehicle on paved public roadway with dirt/mud/debris on undercarriage (track out) or load spillage.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☒ Section 9.09(b)(2) Unlawful to cause or allow the emission of an air contaminant as determined by a CEM that is greater than 5% opacity for a 7 hr. Average
- ☐ Section _____

FACTS ALLEGED TO CONSTITUTE A VIOLATION

Causing or allowing the emission of an air contaminant from the main stack in excess of the standard at 3801 East Marginal Wy So. in Seattle.

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By

Form No. 70-119 (Revised 9/93)

Date/Time

3/12/96

Received By

Signing this Notice is not an admission of guilt

AGCS2M001062

PUGET SOUND AIR POLLUTION CONTROL AGENCY

110 Union Street, Suite 500, Seattle, Washington 98101-2038

206-343-8800 / 1-800-552-3565 / Fax 206-343-7522

Registration No. 11339
 Cert. Mail No. 2035473352

No. **34413**

NOTICE OF VIOLATION

Date of Violation: December, 19 95 at _____ .m.

Name <u>Ash Grove Cement Co.</u>		Responsible Person, Title <u>Gerry Brown Enviro. Manager</u>	
Location of Violation (Address) <u>3801 East Marginal Way So.</u>	City <u>Seattle</u>	Zip <u>98134</u>	County <u>King</u>
Mailing Address <u>as above</u>	City, State <u>Seattle, WA.</u>	Zip <u>"</u>	Phone <u>(206) 623-5596</u>

DID UNLAWFULLY CAUSE OR ALLOW VIOLATION OF:

REGULATION _____ OF THE PUGET SOUND AIR POLLUTION CONTROL AGENCY FOR:

- ☐ Section 5.05(e) Failure to develop and implement an operation and maintenance plan.
- ☐ Section 6.03(a) Failure to obtain Notice of Construction approval prior to construction/installation/establishment of a source.
- ☐ Section 6.09(b) Failure to meet conditions of an Order of Approval.
- ☐ Section 9.03(a) Visible emissions in excess of 20% opacity for periods aggregating more than 3 minutes/hour.
- ☐ Section 9.04 Particulate matter deposited in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.11(a) Emission of air contaminant in quantities/characteristics/duration so as to be injurious or interfere with enjoyment of life/property.
- ☐ Section 9.12(b) Emission of odor-bearing air contaminants without use of best available control technology.
- ☐ Section 9.15(a) Emission of fugitive dust without use of best available control technology.
- ☐ Section 9.15(b) Operation of vehicle on paved public roadway with dirt/mud/debris on undercarriage (track out) or load spillage.
- ☐ Section 9.15(c) Emission of fugitive dust from manufacturing process equipment or control apparatus.
- ☐ Section 9.16 Failure to apply VOC-containing material using spray equipment in an enclosed area with filtered exhaust and vertical stack.
- ☐ Section 9.20 Failure to operate and maintain equipment in good working order.
- ☒ Section Notice of Construction #5730 Condition 6(B) emissions from the main Baghouse shall not exceed; NOx 700 ppm 1-hr. Average.
- ☐ Section _____

FACTS ALLEGED TO CONSTITUTE A VIOLATION Failure to meet Notice of Construction, number 5730 Condition 6(B) 1 hour average NOx limit from the main stack at 3801 E. Marginal Way So. in Seattle.

CORRECTIVE ACTION ORDER

Under the provisions of Section 3.09 of Regulation I and RCW 70.94.211 you are ordered to submit a written report within ten (10) days of receipt of this Notice describing the necessary corrective action you have taken or propose to take, including a schedule, to achieve continuous compliance with the regulations, and take the following necessary corrective action:

Issued By *Elizabeth Lips*

3/12/96
Date/Time *cm*

Received By _____
 Signing this Notice is not an admission of guilt